UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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LACONIA PROPERTIES LLC., 6220

Index No. 07 CV

Plaintiff,

-against-

Honorable Loretta A. Preska

TRAVELERS PROPERTY CASUALTY COMPANY OF AMERICA a/k/a ST PAUL TRAVELERS INSURANCE COMPANY,

Defendants.

____X

Defendants' Response to Plaintiff's Proposed Exhibits

- a. No objection.
- b. Objection: Self serving; Hearsay.
- c. Objection: Self serving; Hearsay.
- d. No objection.
- e. Objection: See motion *in limine* re alleged untimely denial of coverage.
- f. Objection: Hearsay
- g. Objection: Hearsay
- h. Objection: Photograph in question has not been provided to Defendant.
- i. Objection: Hearsay.
- j. No objection subject to authentication.
- k. Objection: Hearsay unless Neil Schmelkin PE testifies to the document.
- I. No objection.

- m. No objection.
- n. No objection.
- Objection: Hearsay Ο.
- Objection: Hearsay unless Neil Schmelkin PE testifies to the p. document.
- Objection: Hearsay. q.
- Objection: Hearsay. r.
- Objection: Hearsay. S.
- Objection: Hearsay. t.
- Objection: Hearsay unless Neil Schmelkin PE testifies to the u. document.

Dated: Melville, New York November 30, 2007

Respectfully submitted,

SPEYER & PERLBERG, LLP Attorneys for Defendant

By:

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